

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Case No: 3:18-cr-00577-CRB-1

Case Name: USA v. Michael Richard LynchUSA v. Stephen Keith Chamberlain

**TRIAL SHEET, EXHIBIT and WITNESS LIST**

<b>JUDGE:</b> Charles R. Breyer	<b>PLAINTIFF ATTORNEY:</b> Adam Reeves, Kristina Green, Robert Leach, Zacahry Abrahamson	<b>DEFENSE ATTORNEY:</b> Gary Lincenberg, Michael Landman, Ray Seilie (Chamberlain)  Christopher J. Morvillo Celeste Koeleveld Brian Heberlig Jonathan Baum Reid Weingarten (Lynch)
<b>TRIAL DATE:</b> April 10, 2024	<b>REPORTER(S):</b> Rhonda Aquilina Jennifer Coulthard	<b>CLERK:</b> Lashanda Scott

PLF NO.	DEF NO.	DATE/TIME OFFERED	ID	REC	DESCRIPTION	BY
		9:18 a.m.  9:20 a.m.			Judge cried-in. Court Reporter – Rhonda Aquilina. Jurors not present. All parties present. The Court excused Juror Number 6. All parties stipulate to the dismissal of Juror Number 6. All jurors present. All parties present. Defense (Lynch) cross-examination of witness <b>Lee P. Welham</b>	
	1439		X	X	Exhibit 1439 marked and admitted Deloitte research memo: Changes to VAR Agreement -- IAS 18 Considerations (clean and redline version [no bates numbers])	
	6737		X		Exhibit 6737 marked (Demonstrative)	
	6169		X	X	Exhibit 6169 marked and admitted Email chain between BardenP, KnightsR, RobertsonC, HackingJ, KnightR, Welham re Discussion with Phil Barden – note	
	16981		X	X	Exhibit 16981 marked and admitted Deloitte Working Paper 8180 (Accounting for transactions with Filetek Inc.)	
	542		X	X	Exhibit 542 marked and admitted Email from WelhamL to MurrayT re Autonomy attaching Autonomy Integration of Filetek in Digitalsafe.pptx	

	4309		X	X	Exhibit 4309 marked and admitted 8140a Revenue deals \$1m y e 31 12 09.xls	
	2598		X	X	Exhibit 2598 marked and admitted Spreadsheet excerpt: To test the > \$1m revenue deals of Q1 2010	
	17204		X	X	Exhibit 17204 marked and admitted Q2 - 5760 Purchase of additional Storhouse tech from Filtek.doc	
	979		X		Exhibit 979 previously admitted	
	4142		X	X	Exhibit 4142 marked and admitted 00003 - 00005 - Minutes of a meeting of the Audit Committee held on 20 July 2010.pdf	
	271		X		Exhibit 271 previously admitted	
	2023		X		Exhibit 2023 previously admitted	
	4447		X		Exhibit 4447 marked and admitted Q2 2279a Metrics testing.xls	
	2023		X		Exhibit 2023 previously admitted	
	7644		X	X	Exhibit 7644 marked and admitted Email from MurrayT to MacfarlaneJ re: "Worksheet in 2273 Press release calculations, cash conversions, organic growth.xls"	
	428		X		Exhibit 428 previously admitted	
	51		X		Exhibit 51 previously admitted	
	6418		X	X	Exhibit 6418 marked and admitted 8140a Revenue contracts over \$1m - US Legacy (including attachments A to G)	
	7823		X	X	Exhibit 7823 marked and admitted Memo by AndersonA re: "Deutsche Bank - revenue recognition"	
	7824		X	X	Exhibit 7824 marked and admitted Memo by AndersonA re: "Autonomy Corporation plc Morgan Stanley - Revenue recognition Q3 2008"	
		10:32 a.m.			Jurors on break	
		10:44 a.m.			Court would like to ask questions of the witness Lee P. Welham – the parties have no objections. Court's inquiry re link transactions. Court in recess	
		10:58 a.m.			Court reconvened. Court Reporter – Jennifer Coulthard. All jurors present. All parties present. Defense (Lynch) cross-examination of witness Lee P. Welham	
	979		X		Exhibit 979 previously admitted	
	4419		X	X	Exhibit 4419 marked and admitted Q2 - 8130b Q2 2010 \$1m revenue testing.xls	
	1113		X	X	Exhibit 1113 marked and admitted Excel Workbook: "Revenue Deals over \$1M" (Summary, Capax-Amgen Revenue Testing Tabs)	

	1414		X	X	Exhibit 1414 marked and admitted Excel Workbook: "Revenue Deals over \$1M" (Summary, Bof A/DT Revenue Testing Tabs)	
	1416		X	X	Exhibit 1416 marked and admitted Excel Workbook: "Revenue Deals over \$1M" (Summary, Tikit Revenue Testing Tabs)	
	1708		X	X	Exhibit 1708 marked and admitted Excel Workbook: "Revenue Deals over \$1M" (Summary, Capax/McAfee Revenue Testing Tabs)	
	1709		X	X	Exhibit 1709 marked and admitted Excel Workbook: "Revenue Deals over \$1M" (Summary, Microtech Internal Use Revenue Testing Tabs)	
	1947		X	X	Exhibit 1947 marked and admitted Excel Workbook: "Revenue Deals over \$1M" (Summary, HP/Microtech Revenue Testing Tabs)	
	1945		X	X	Exhibit 1945 marked and admitted Excel Workbook: "Revenue Deals over \$1M" (Summary, Discovertech/Abott Revenue Testing Tabs)	
	4252		X	X	Exhibit 4252 marked and admitted 8140a US revenue deals (inc IWOV) \$1m Q2 2009.xls	
	4310		X	X	Exhibit 4310 marked and admitted 8140b Revenue Deals \$1m Q4 2009.xls	
	4380		X	X	Exhibit 4380 marked and admitted Q3 - 8130a Q3 2010 \$1m revenue testing.xls	
	4412		X	X	Exhibit 4412 marked and admitted Q3 - 8130b Q3 2010 \$1m revenue testing.xlsx	
	4417		X	X	Exhibit 4417 marked and admitted Q4 8130b Q4 2010 \$1m revenue testing.xlsx	
	4419		X	X	Exhibit 4419 marked and admitted Q2 - 8130b Q2 2010 \$1m revenue testing.xls	
	4428		X	X	Exhibit 4428 marked and admitted Q1 8130a Q1 2011 \$1m revenue testing.xlsx	
	6364		X	X	Exhibit 6364 marked and admitted 8140a US revenue deals (inc IWOV) \$1m Q2 2009 (including attachments A to L)	
	6369e		X	X	8140a US revenue deals \$1m Q3 2009 (including attachments A to H)	
	6371		X	X	Exhibit 6371 marked and admitted 8140b Revenue Deals \$1m Q3 2009 (including attachments A to G)	
	6379		X	X	Exhibit 6379 marked and admitted Q1 - 8130b Revenue Deals \$1m Q1 2010 (including attachments A to L)	
	6388		X	X	Exhibit 6388 marked and admitted Q2 - 8130a Q2 2010 \$1m revenue testing (including attachments A to J)	

	6389		X	X	Exhibit 6389 marked and admitted Q2 - 8130c Q2 2010 \$1m revenue testing (including attachments A to J)	
	6390		X	X	Exhibit 6390 marked and admitted Q2 - 8130b Revenue deals \$1m Q2 2010 (including attachments A to F)	
	6417		X	X	Exhibit 6417 marked and admitted 8140b US revenue deals \$1m Q2 2009 (IWOV + Inc) (including attachments A to J)	
	7632		X	X	Exhibit 7632 marked and admitted Deloitte Workbook: Q3 2009 Testing Summary	
	7633		X	X	Exhibit 7633 marked and admitted Q2 8130b Q2 2011 \$1m revenue testing	
	17186		X	X	Exhibit 17186 marked and admitted 8140a US revenue deals \$1m Q3 2009.xls	
	1440		X	X	Exhibit 1440 marked and admitted	
	4340		X	X	Exhibit 4340 marked and admitted 8190A Memo on the accounting for VMS.doc	
	4352		X	X	Exhibit 4352 marked and admitted 5290 Microlink acquisition.doc	
	4446		X	X	Exhibit 4446 marked and admitted Q2 - 8131 Accounting for the IM licence revenue fair value adjustment.xlsx	
	17195		X	X	Exhibit 17195 marked and admitted 8180 Memo covering recoverability considerations for Integracion_798819_1.doc	
	17196		X	X	Exhibit 17196 marked and admitted 8191B EMC related revenue deals - principal versus agent.doc	
	17200		X	X	Exhibit 17200 marked and admitted Q1 - 9115 Microlink OBS testing paper.xls	
	8731		X	X	Exhibit 8731 marked and admitted Deloittee Review Exel Sheet - File name: "Q2 - 8180 Hardware revenue summary PBC.xls"	
	8732		X	X	Exhibit 8732 marked and admitted Q2-8130H Hardware Revenue Testing.xls	
	8733		X	X	Exhibit 8733 marked and admitted Q3 - 8130a Hardware revenue summary.xls	
	8734		X	X	Exhibit 8734 marked and admitted Q2 - 8130 Hardware Revenue Testing Q2 2010.xls	
	8740		X	X	Exhibit 8740 marked and admitted 8130 Hardware Revenue Testing Q4 2010.xls	
	17180		X	X	Exhibit 17180 marked and admitted 8115 Hardware Sale Analysis 2010 YE.xls	
	17181		X	X	Exhibit 17181 marked and admitted 8116 Hardware Revenue Analysis 2010 (PBC).xls	
	17206		X	X	Exhibit 17206 marked and admitted Q2 - 8180 Hardware revenue summary PBC.xls	

	6753		X	X	Exhibit 6753 marked and admitted Project Tesla - Auditors questions from KPMG (notes) Project Tesla - Auditors questions from KPMG (notes)	
		11:18 a.m.			Defense (Chamberlain) cross-examination of witness Lee P. Welham	
	9506		X	X	Exhibit 9506 marked and admitted 2009 Audit Planning Memorandum	
	9631		X	X	Exhibit 9631 marked and admitted Email from MurrayT to ChamberlainS, cc: StephanM, P. Prentis, HarrisL and AndersonA re 13-10-10 Outstanding list (with attachment)	
	482	(withdrawn)			Exhibit 482 (withdrawn)	
	9693		X	X	Exhibit 9693 marked and admitted Q4 2009 \$100k deals spreadsheet	
	1445		X		Exhibit 1445 previously admitted	
		11:52 a.m.			Jurors on break	
		12:09 p.m.			Discussion with the parties re Defense (Chamberlain) cross-examination. Court in recess	
		12:52 p.m.			Court reconvened. Court Reporter – Jennifer Coulthard. All jurors present. All parties present Defense (Chamberlain) cross-examination of witness Lee P. Welham	
	1439		X		Exhibit 1439 previously admitted	
	1947		X		Exhibit 1947 previously admitted	
	1793		X		Exhibit 1793 previously admitted	
	2559		X		Exhibit 2559 previously admitted	
	583		X		Exhibit 583 previously admitted	
	9779		X	X	Exhibit 9779 marked and admitted Email from L. He to M. Stephan, cc: P. Prentis, S. Chamberlain, T. Murray, A. Jackson, A. Anderson and others at Deloitte re: Outstanding list of 13 Jan 2011	
	6741		X	X	Exhibit 6741 marked and admitted Email from Cynthia Watkins to Christopher Spencer, copying Poppy Prentis, Lisa Harris, Chamberlain et al re: Q2 Balancer Sheet and P+L reviews for audit	
	9755		X	X	Exhibit 9755 marked and admitted Email from A. Anderson to L. Welham re: Emailing: Microlink (with attachment)	
	482		X	X	Exhibit 482 marked and admitted Excel Workbook: Revenue Deals over \$1M (Summary, MS Revenue Testing tabs)	
	9721		X	X	Exhibit 9721 marked and admitted Deloitte work paper	

	16981		X		Exhibit 16981 previously admitted	
	263		X		Exhibit 263 previously admitted	
	1417.1		X		Exhibit 1417.1 previously admitted	
	157		X		Exhibit 157 previously admitted	
	158		X	X	Exhibit 158 marked and admitted Email from WelhamL to MurrayT et al re EMC	
	979		X		Exhibit 979 previously admitted	
	2993		X		Exhibit 2993 previously admitted	
	9771		X	X	Exhibit 9771 marked and admitted Email from G. Vaidyanathan to L. Welham re: Re: Subsequent events	
	17215		X	X	Exhibit 17215 marked and admitted Q4 8130b.3 Memo Structure of Bank of America Deals in Q4 2010.doc	
	1354		X		Exhibit 1354 previously admitted	
	1438		X		Exhibit 1438 previously admitted	
	1414		X		Exhibit 1414 previously admitted	
	1437		X	X	Exhibit 1437 marked and admitted Minutes for Autonomy 2010 Audit Planning Meeting attended by HussainS, ChamberlainS, MercerN and WelhamL with handwritten notes	
		2:15 p.m.			Court in recess	
		2:40 p.m.			Court reconvened. Court Reporter – Rhonda Aquilina. Jurors not present. All parties present.	
		2:41 p.m.			All jurors present. All parties present Defense (Chamberlain) cross-examination of witness Lee P. Welham	
	1437		X		Exhibit 1437 previously admitted	
	9779.1		X		Exhibit 9779.1 previously admitted	
	1459		X	X	Exhibit 1459 marked and admitted Email from WelhamL to ChamberlainS re Microtech	
	1493		X		Exhibit 1493 previously admitted	
	1507		X		Exhibit 1507 previously admitted	
	1508		X		Exhibit 1508 previously admitted	
	1503		X		Exhibit 1503 previously admitted	
	20068.15		X		Exhibit 20068.15 marked	
	1509		X		Exhibit 1509 previously admitted	
	9737		X	X	Exhibit 9737 marked and admitted Email from L. Welham to N. Mercer re: RE: o/s list	

	1412		X	X	Exhibit 1412 marked and admitted Excel Workbook: Test the Consolidation Adjustment for Discovertech	
	2989		X	X	Exhibit 2989 marked and admitted Minutes of the meeting of the Audit Committee of the Board of Directors	
	9657		X	X	Exhibit 9657 marked and admitted Email from M. Stephan to L. Blake re: RE: Bank of America POD q4 2010	
	16506		X	X	Exhibit 16506 marked and admitted 12/31/10 letter from BaioccoJ to EganC re "Replacement of Purchase Order" signed by EganC	
	16794		X	X	Exhibit 16794 marked and admitted MicroTech Purchase Order: Bank of America agreement Number CW262581	
		3:19 p.m.			Government re-direct of witness Lee P. Welham	
1352			X		Exhibit 1352 previously admitted	
		3:36 p.m.			Defense (Lynch) re-cross examination of witness Lee P. Welham	
		3:41 p.m.			Witness excused. Jurors excused until April 11, 2024 at 9:15 a.m.	
		3:46 p.m.			All parties present.	
		4:16 p.m.			Counsel for HP - Susan Diane Resley, Madeleine Ayer and Bakari Ziegler (Hewlett Packard)	
		4:51 p.m.			Motion to Quash hearing - Discussion re production of documents in the U.K. action.	
					Court in recess	
					Court reconvened. Motion to Quash hearing held.	
					Discussion re document for Yelland.	
					Court adjourned	